

Cath Petroskey

From: Frank Krist <krist@speednetllc.com>
Sent: Tuesday, February 9, 2016 12:15 AM
To: Cath Petroskey
Subject: Great Lakes Net-Pen Aquaculture
Attachments: Lake Huron Citizens Fishery Advisory Committee Overview of the Concerns of Net Pen Aquaculture in the Great Lakes --.pdf

Dear Aquaculture Committee Clerk Petroskey:

This letter provides the views of the Lake Huron Citizens Fishery Advisory Committee regarding commercial net-pen (cage) aquaculture in Michigan's public-trust waters. I have sent a copy of this letter to each member of the Committee.

For your information, the Lake Huron Citizen Fishery Advisory Committee was established in 1989 by David Hale, a previous Director of the Michigan Department of Natural Resources (MDNR), and the membership consists of 25 port representatives, stakeholders and organizations from across the State. The group meets quarterly each year with biologists and managers from the MDNR and other agencies. The charge of the Lake Huron Citizens Fishery Advisory Committee is to review and provide to the MDNR recommendations and direction into the fishery goals, objectives and management plans for Lake Huron. It is in the spirit of that charge that we convey our concerns about net-pen aquaculture.

The Quality of Life Departments (Michigan Department of Environmental Quality, Michigan Department of Natural Resources, and Michigan Department of Agriculture and Rural Development) are working together closely and will be making a decision soon on whether to recommend the establishment of commercial net-pen aquaculture in the Great Lakes. The Lake Huron Citizens Fishery Advisory is opposed to commercial net-pen (or cage) aquaculture in all waterways of the State of Michigan, as supported by our attached issue statement. To summarize that document, net-pens are by any definition of "nets" porous, thus rendering impossible the capture and proper treatment of excrement, waste feed, dead fish, and drug, antifoulant, and other chemical residues. The amount of phosphorus released from a scaled-up net-pen-based aquaculture industry, as envisioned by the industry's strategic plan, could easily equal the amount of phosphorus that would be released from the City of Grand Rapids if its sewage effluent was allowed to be untreated. Phosphorus is a limiting nutrient in the Great Lakes and releases of the scale envisioned by the aquaculture industry would certainly have serious consequences to the Great Lakes and Michigan's obligations to the Great Lakes Water Quality Plan (International Joint Commission). Fish escapements are routine with net-pens and the release of these domesticated fish will threaten the genetic fitness of Michigan's renowned wild steelhead strain of rainbow trout. As with avian flu in confined animal operations, the close confinement of fish in net-pens provides a breeding ground for fish pathogens that tend to become more virulent in these circumstances, and are especially so when passed on to wild fish that have not been bred (as have the domesticated trout) for disease resistance.

For these reasons, licensing of commercially-scaled net-pen (cage) aquaculture in the Great Lakes would be a violation of the State of Michigan's responsibility to manage the Great Lakes and their bottom lands as a trust responsibility to present and future citizens of the State. Furthermore, we are perplexed and concerned that the Department of Environmental Quality and the MDNR have not spoken out in opposition and shown leadership in protection of our public trust resources in response to recent net-pen commercial aquaculture proposals.

Thank you for your attention to our concerns.

Frank Krist
Chairperson
Lake Huron Citizens Fishery Advisory Committee
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